

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 )  
Jesnique Johnson, ) CASE NO. 19 B 01500  
 ) HON. Jacqueline P. Cox  
 ) CHAPTER 13  
DEBTOR. )

**NOTICE OF MOTION**

TO: Tom Vaughn, Chapter 13 Trustee, 55 E. Monroe St. STE 3850, Chicago, IL 60603, via electronic court notification;  
Anna Valencia, City Clerk, 121 N. LaSalle Street, Room 107, Chicago, IL 60602;  
See attached Service List.

Please take notice that on April 27, 2020, at 9:00 a.m., I shall appear before the Honorable Judge Jacqueline P. Cox in Courtroom 680 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached motion and you may appear if you so choose.

A party who objects to this motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on April 10, 2020.

/s/ Steve Miljus  
Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625

Label Matrix for local noticing  
0752-1  
Case 19-01500  
Northern District of Illinois  
Eastern Division  
Fri Apr 10 08:08:20 CDT 2020

NAVIENT SOLUTIONS, LLC ON BEHALF OF DEPT OF E  
PO BOX 9635  
WILKES BARRE, PA 18773-9635

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

City of Chicago - Parking and red Light Tick  
121 N. LaSalle Street  
Chicago, IL 60602-1202

City of Chicago - Parking and red Light Tick  
Department of Revenue - PO Box 88292  
Chicago, IL 60680

City of Chicago Department of Finance  
c/o Arnold Scott Harris, P.C.  
111 W. Jackson Blvd Ste. 600  
Chicago, IL 60604-3517

City of Detroit Parking Violations  
1001 10th St  
Detroit, MI 48216-1991

City of Detroit Parking Violations  
PO Box 2549  
Detroit, MI 48231-2549

Credit Acceptance Corp  
c/o Weber & Olcese PLC  
3250 W. Big Beaver Rd. Ste. 124  
Troy, MI 48084-2902

Credit Acceptance Corporation  
25505 W 12 Mile Road, Suite 3000  
Southfield, MI 48034-8331

DEPT OF ED/NAVIENT  
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DTE ENERGY  
One Energy Plaza  
Detroit, MI 48226-1221

DTE ENERGY  
P.O. Box 740786  
Cincinnati, OH 45274-0786

EL-GA CRE UN  
2303 S CENTER RD  
BURTON, MI 48519-1147

HARRIS & HARRIS LTD  
111 W Jackson Blvd S-400  
Chicago, IL 60604-4135

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222 Merchandise Mart Plaza, Suite 1900  
Chicago, IL 60654-1421

Henry Ford Medical Center  
2799 W Grand Blvd  
Detroit, MI 48202-2689

NPRT0 Illinois, LLC  
256 West Data Drive  
Draper, UT 84020-2315

Navient Solutions, LLC. on behalf of  
Department of Education Loan Services  
PO BOX 9635  
Wilkes-Barre, PA 18773-9635

(p)PROG LEASING LLC  
256 WEST DATA DRIVE  
DRAPER UT 84020-2315

Progressive Leasing  
256 West Data Drive  
Draper, UT 84020-2315

UNIVERSITY OF MICH CR  
340 E HURON ST STE 100  
ANN ARBOR, MI 48104-1946

University of Michigan Credit Union  
Attn.: Krystle Sheardown  
340 East Huron Street  
Ann Arbor, MI 48104-1909

Village of Carol Stream  
Po Box 76965  
Red Light Photo Enforcement Program  
Cleveland, OH 44101-6500

Village of Maywood Finance Department, Parki  
40 Madison St  
Maywood, IL 60153-2323

Village of Maywood Finance Department, Parki  
P.O. Box 22091  
Tempe, AZ 85285-2091

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Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
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Chicago, IL 60604-2027

Steve Miljus  
The Semrad Law Firm, LLC  
20 S Clark, 28th  
Chicago, IL 60603

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Progressive Leasing	End of Label Matrix	
10619 South Jordan Gateway #100	Mailable recipients	30
South Jordan , UT 84095	Bypassed recipients	0
	Total	30

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IN RE:	)	
	)	CASE NO. 19 B 01500
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	)	CHAPTER 13
DEBTOR.	)	

**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Jesnique Johnson, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and moves this Honorable Court to enter an Order modifying the Chapter 13 Plan. Debtor states as follows:

1. On January 18, 2019, the Debtor filed a petition for relief pursuant to Chapter 13, Title 11 of the United States Code.
2. On March 18, 2019, this Honorable Court confirmed the Debtor's Chapter 13 Plan, with secured creditors to be paid 100.00% of their allowed claims, and general unsecured creditors are to be paid 10.00% of their allowed claims.
3. That the confirmed Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$350.00 on a monthly basis for a term of 36 months.
4. Debtor is currently not working due to the situation caused by the spread of the Coronavirus (COVID-19). As a result, Debtor is deprived of her source of income thus she cannot afford the current payment and all other expenses.
5. Debtor seeks to defer the current Plan default through April of 2020 and suspend the May, June and July 2020 Plan payments.
6. Debtor respectfully requests this Honorable Court defer the current plan default to the end of the plan of reorganization.

7. Debtor further requests this Honorable Court to suspend Chapter 13 Trustee plan payments for three months, the months of May, June and July of 2020, with regular monthly Trustee plan payments to resume in August of 2020.
8. That Debtor filed the instant case in good faith and intends to complete the Chapter 13 Plan of reorganization.

WHEREFORE, Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order modifying the Debtor's Chapter 13 Plan in order to defer the current plan default to the end of the plan of reorganization; and
- B. That this Honorable Court enter an Order suspending Debtor's Chapter 13 Trustee plan payments for three months, the months of May, June and July of 2020, with regular monthly Trustee plan payments to resume in August of 2020; and
- C. That this Honorable Court Order any further relief as the Court may deem fair and proper.

Respectfully submitted,

/s/ Steve Miljus  
Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625